





4. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391 and 1400(b). Upon information and belief, the Defendant has offices in this district, transacts or has transacted business in this judicial district, or committed and/or induced acts of patent infringement in this district. These purposeful acts and/or transactions in Texas are such that Credit Suisse should reasonably know and expect that it could be hailed into a Texas court.

**INFRINGEMENT OF U.S. PATENT NOS. 7,206,762; 8,046,292; and 8,046,293**

5. On April 17, 2007, United States Patent No. 7,206,762 (the “‘762 patent”) was duly and legally issued to Jean-Yves Sireau (“Sireau”) for an invention titled “Betting System and Method”. On or about December 13, 2000, Mr. Sireau assigned all rights, title, and interest in and to the ‘762 Patent to Fixed-Odds Group Ltd, a Bahamas corporation. Subsequently, Fixed-Odds Group Ltd. changed its name to Regent Markets Group Ltd., and subsequently re-domiciled to Jersey (Channel Islands). Regent remains the sole assignee of the ‘762 Patent. A true and correct copy of the ‘762 Patent is attached hereto as Exhibit A. On October 25, 2011, United States Patent Nos. 8,046,292 (the “‘292 Patent”) and 8,406,293 (the “‘293 Patent”) were duly and legally issued to Mr. Sireau. True and correct copies of the ‘292 and ‘293 Patents are attached hereto as Exhibits B and C respectively. Both the ‘292 and ‘293 Patents were assigned to Regent Markets Group Ltd. The ‘762, the ‘292, and the ‘293 Patents (collectively, the “Regent Patents”) all relate to systems and methods for operating fixed-odds betting systems.

6. Pursuant to 35 U.S.C. § 282, the Regent Patents are presumed valid.

7. To the extent necessary, Plaintiff has complied with the notice and marking requirements of 35 U.S.C. § 287.

8. The Regent Patents relate generally to a fixed-odds betting system and, more specifically, to a method and system for buying and selling of fixed-odd financial bets wherein

the system calculates the fixed odds for a bet based on input from a user and data relating to a financial market.

9. Regent Markets Group is a leading international financial betting company, offering a wide range of fixed-odds financial bets on foreign exchange rates, stock indices, stocks, and commodities. The company was founded in October 1999 by Mr. Sireau, who first conceived of the idea of developing an automated betting system and method for offering fixed-odds financial bets over the internet. Mr. Sireau's work culminated in a European Patent Application filed in March 2000 and subsequently that year the launch of Regent Market Group's internet betting website and system. Since that time, Regent Markets Group has grown into a multinational firm, transacting over \$150 million of fixed-odds financial bets per annum with thousands of clients worldwide.

10. Credit Suisse is the banking business of Credit Suisse Group AG, a holding company based in Zurich, Switzerland. Credit Suisse's Investment Banking Division offers securities products to clients such as corporations, governments, and institutional investors. These securities products include the Merlin FX trading platform and the Merlin iPhone app, which both provide users with an online platform for customization, pricing, and execution of vanilla and exotic forex options, including binary and fixed-odds bets.

11. Credit Suisse, upon information and belief, has infringed and continues to infringe the RegentPatents by its manufacture, use, sale, and/or offer for sale of Credit Suisse's Merlin FX trading platform. Credit Suisse infringes one or more claims of U.S. Patent Nos. 7,260,762; 8,046,292; and 8,046,293 either literally or under the doctrine of equivalents. Credit Suisse also contributes to and induces others to manufacture, use, sell, import, and/or offer for sale products

and services that infringe the Regent Patents. Credit Suisse is liable for its infringement of the Regent Patents pursuant to 35 U.S.C. § 271.

12. Credit Suisse has violated and continues to violate 35 U.S.C. § 271 (a), (b), (c), and (f). Specifically, Credit Suisse has continued to make, use, sell, and offer to sell products that infringe the claims of U.S. Patent Nos. 7,260,762; 8,046,292; and 8,046,293. Credit Suisse also continues to contribute to and induce infringement by others, without a license under the Patents.

13. Accordingly, Credit Suisse's acts of infringement of U.S. Patent Nos. 7,260,762; 8,046,292; and 8,046,293, as alleged above, have injured Plaintiff and thus, Plaintiff is entitled to recover damages adequate to compensate it for Credit Suisse's acts of infringement, which in no event can be less than a reasonable royalty.

14. Credit Suisse's acts of infringement are causing irreparable harm and damage to Regent.

#### **JURY DEMAND**

15. Plaintiff hereby demands a jury trial on all claims and issues.

#### **PRAYER FOR RELIEF**

A. Plaintiff seeks a declaration that Credit Suisse has infringed and continues to infringe United States Patent Nos. 7,206,762; 8,046,292; and 8,046,293.

B. Plaintiff seeks an award of damages arising out of Defendant's infringement of United States Patent Nos. 7,206,762; 8,046,292; and 8,046,293, including enhanced damages pursuant to 35 U.S.C. § 284, together with prejudgment and post-judgment interest, in an amount according to proof.

C. Plaintiff seeks an award of its attorney fees, costs, and expenses pursuant to 35 U.S.C. § 285 or as otherwise permitted by law.

D. Plaintiff seeks an order permanently enjoining Credit Suisse and its respective officers, agents, employees and those acting in privity with it, from further infringement of United States Patent Nos. 7,206,762; 8,046,292; and 8,046,293.

E. Plaintiff seeks such other and further relief as the Court may deem just and proper.

DATED: February 14, 2012

Respectfully submitted,

/s/ Edward W. Goldstein  
Edward W. Goldstein – Attorney-in-Charge  
Texas Bar No. 08099500  
Southern District of Texas Bar No. 586  
Gregg L. Goldstein  
Texas Bar No. 24044908  
Southern District of Texas Bar No. 625033  
GOLDSTEIN & LIPSKI, P.L.L.C.  
1177 West Loop South, Suite 400  
Houston, Texas 77027  
Telephone: (713) 877-1515  
Facsimile: (713) 877-1737  
E-Mail: egoldstein@gliplaw.com  
ggoldstein@gliplaw.com

*ATTORNEYS FOR PLAINTIFF*